

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CRISTALLA CONDOMINIUM
ASSOCIATION, a Washington nonprofit
corporation,

Plaintiff,

AFFILIATED FM INSURANCE COMPANY,
a foreign insurance company,

Defendant.

COME NOW the parties, Plaintiff Cristalla Condominium Association (“Cristalla”), and Defendant Affiliated FM Insurance Company (“AFM”), by and through their counsel of record herein, and hereby stipulate and agree to this Court’s entry of the subjoined, agreed Order below for the reasons set forth herein.

STIPULATION

1. Plaintiff Cristalla and Defendant AFM stipulate to this Court's entry of the agreed Order below extending the current trial date and all other pre-trial cut-off dates by 60

**STIPULATED MOTION AND ORDER AMENDING MINUTE
ORDER SETTING TRIAL DATE & RELATED DATES
(Cause No. 2:16-cv-1838) – 1
SMS6500.018/2692767x**



901 FIFTH AVENUE, SUITE 1700
SEATTLE, WASHINGTON 98164
TELEPHONE: (206) 623-4100
FAX: (206) 623-9273

1 days—including cut-off dates for the completion of discovery, the settlement conference date,
2 and the dates for filing all dispositive motions and motions in limine.

3 2. The parties stipulate to this extension for several reasons. First, the parties
4 wish to proceed to mediation and are presently in the process of scheduling a mediation to
5 occur during the month of December 2017 with mediator Tom Harris. Second, Plaintiff
6 wishes to forestall certain deposition discovery requested by Defendant, permitting only the
7 Rule 30(b)(6) deposition of Plaintiff prior to mediation and conducting all other depositions
8 after mediation (if mediation proves unsuccessful). Third, the parties are awaiting this Court's
9 Order on Plaintiff's pending Motion for Partial Summary Judgment (Docket #17), which has
10 been fully briefed, the outcome of which may impact the scope of discovery and issues for
11 trial. Fourth, Defendant AFM's lead trial counsel, Scott Stickney, has a family obligation that
12 makes the presently set trial date of March 5, 2018, unworkable.

13 3. The parties believe a 60-day continuance will be sufficient to accommodate
14 their needs and to allow for a mediation to occur in December 2018, after which discovery
15 may be completed if mediation is unsuccessful, affording the parties sufficient time to be
16 ready for trial on or about **May 7, 2018**.

17 4. While the parties have filed previous stipulated motions to make minor
18 alterations to other pre-trial deadlines (which motions this Court has granted), this is the first
19 request for a change in the trial date. Neither party foresees the need for any further trial

20 ///

21 ///

22 ///

23 ///

24 STIPULATED MOTION AND ORDER AMENDING MINUTE
25 ORDER SETTING TRIAL DATE & RELATED DATES
26 (Cause No. 2:16-cv-1838) – 2
SMS6500.018/2692767x



901 FIFTH AVENUE, SUITE 1700
SEATTLE, WASHINGTON 98164
TELEPHONE: (206) 623-4100
FAX: (206) 623-9273

1 continuances other than the one herein requested.

2 DATED: October 11, 2017

3 s/ Scott M. Stickney

4 Scott M. Stickney, WSBA No. 14540
5 stickney@wscd.com
6 Maria E. Sotirhos, WSBA No. 21726
7 sotirhos@wscd.com
8 WILSON SMITH COCHRAN DICKERSON
9 901 Fifth Avenue, Suite 1700
10 Seattle, WA 98164
11 (206) 623-4100 phone
12 (206) 623-9273 fax
13 Attorneys for Defendant
14 Affiliated FM Insurance Company

s/ Todd C. Hayes

Todd C. Hayes, WSBA No. 26361
todd@harperhayes.com
HARPER | HAYES PLLC
One Union Square
600 University St., Ste. 2420
Seattle, WA 98101
(206) 340-8010 phone
(206) 260-2852
Attorneys for Plaintiff
Cristalla Condominium Association

12 **ORDER**

13
14 THIS MATTER having come on regularly for hearing upon the Stipulation of Plaintiff
15 Cristalla and Defendant AFM, above, and the Court being fully advised, now, therefore, it is
16 hereby **ORDERED, ADJUDGED and DECREED** as follows:

17 1. The Court's Minute Order Setting Trial & Related Dates (Docket # 14) is hereby
18 vacated and the present trial date of March 5, 2018, is stricken.

19 2. The Clerk shall enter a new Minute Order Setting Trial & Related Dates with a
20 new trial date on or about May 7, 2018.

21 DATED: October 17, 2017.

22
23
24
25
26 
Robert S. Lasnik
United States District Judge

STIPULATED MOTION AND ORDER AMENDING MINUTE
ORDER SETTING TRIAL DATE & RELATED DATES
(Cause No. 2:16-cv-1838) – 3
SMS6500.018/2692767x



901 FIFTH AVENUE, SUITE 1700
SEATTLE, WASHINGTON 98164
TELEPHONE: (206) 623-4100
FAX: (206) 623-9273

1
2 Presented by:
3

4 By: s/ Scott M. Stickney
5

6 Scott M. Stickney, WSBA No. 14540
7

8 stickney@wscd.com
9

10 Maria E. Sotirhos, WSBA No. 21726
11

12 sotirhos@wscd.com
13

14 WILSON SMITH COCHRAN DICKERSON
15

16 901 Fifth Avenue, Suite 1700
17

18 Seattle, WA 98164
19

20 (206) 623-4100 phone
21

22 (206) 623-9273 fax
23

24 Attorneys for Defendant
25

26 Affiliated FM Insurance Company
27

28 By: s/ Todd C. Hayes
29

30 Todd C. Hayes, WSBA No. 26361
31

32 todd@harperhayes.com
33

34 HARPER | HAYES PLLC
35

36 One Union Square
37

38 600 University St., Ste. 2420
39

40 Seattle, WA 98101
41

42 (206) 340-8010 phone
43

44 (206) 260-2852
45

46 Attorneys for Plaintiff
47

48 Cristalla Condominium Association
49

50

51

52

53

54

55

56

57 STIPULATED MOTION AND ORDER AMENDING MINUTE
58 ORDER SETTING TRIAL DATE & RELATED DATES
59

60 (Cause No. 2:16-cv-1838) – 4
61

62 SMS6500.018/2692767x
63



901 FIFTH AVENUE, SUITE 1700
SEATTLE, WASHINGTON 98164
TELEPHONE: (206) 623-4100
FAX: (206) 623-9273